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BY ECF

Hon. Robert M. Levy
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Maliek Brown v. City of New York, et al., 19 CV 1575 (NG)(RML)

Your Honor:

I represent the plaintiff. I write to request an extension of discovery from October 15, 2020 until December 1, 2020. Defendants join in this application.

This extension is required due to the difficulties experienced as a result of working from home and other issues related to the COVID-19 pandemic, as well as a delay caused by medical treatment and rehabilitation, received by plaintiff, arising from injuries plaintiff alleges stemmed from the events at issue.

To date, the parties have responded to discovery demands, exchanged paper discovery, procured voluminous medical records, and engaged in extensive case discussions and settlement negotiations. Plaintiff's deposition is scheduled to occur next week, and the parties anticipate scheduling the depositions of defendants shortly thereafter.

I thank the Court for consideration of this request.

Respectfully submitted,

/s

Robert Marinelli

cc: ACC Joseph Zangrilli